



UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
FOURTH DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

and

STATE OF MINNESOTA, by its  
Attorney General Hubert H. Humphrey, III,  
its Department of Health, and its  
Pollution Control Agency,

Civil No. 4-80-469

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION;  
HOUSING AND REDEVELOPMENT AUTHORITY  
OF ST. LOUIS PARK; OAK PARK VILLAGE  
ASSOCIATES; RUSTIC OAKS CONDOMINIUM  
INC; and PHILLIP'S INVESTMENT CO.,

Defendants.

and

CITY OF ST. LOUIS PARK,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

and

CITY OF HOPKINS,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

REILLY TAR &  
CHEMICAL CORPORATION'S  
RESPONSE TO  
STATE OF MINNESOTA'S  
REQUEST FOR ADMISSIONS  
(PHOTOGRAPHS)  
(February 6, 1985)

Defendant Reilly Tar & Chemical Corporation (hereinafter "Reilly") makes the following response to the State of Minnesota's Request for Admissions (Photographs) dated February 6, 1985.

Reilly states that it denies all requests for admissions to the extent that they are not expressly admitted or qualified.

All admissions by Reilly herein that a photograph is "admissible" are made with the qualification that Reilly is admitting that the photograph in question is admissible subject to it being otherwise determined that the photograph in question concerns relevant evidence.

REQUEST FOR ADMISSION

PHOTOGRAPHS SET 1:

1. That each of the photographs identified with Bates Stamp Numbers 219915 through 219938 (a) is a fair and accurate depiction of activities at the Reilly site or of parts of the Reilly facility in 1929; (b) is admissible in evidence; and, (c) fairly depicts:
  - a. # 219915 - east end of cylinder and loading dock;
  - b. # 219916 - cylinder;
  - c. # 219917 - old pipe connection;
  - d. # 219918 - west end of cylinders;
  - e. # 219919 - east end of cylinders; no. 1 in final position; track supports temporary;
  - f. # 219920 - piling driver for building wall, removal of old pier foundation;
  - g. # 219921 - old piers;
  - h. # 219922 - new piers;
  - i. # 219923 - sump at end of cylinder to catch drips; connected by pipe to cylinder to pull liquid back by vacuum;
  - j. # 219924 - # 3 cylinder
  - k. # 219925 - the no. 2 cylinder placed on new foundations;
  - l. # 219926 - side view of new cylinder building
  - m. # 219927 - new heavier rail and steam coil in cylinder no. 2
  - n. # 219928 - reinforcement in the new derrick foundation;
  - o. # 219929 - new foundation for car puller; opening for sheaves;
  - p. # 219930 - catch basin under cylinder door;
  - q. # 219931 - new derrick and mast foundation;
  - r. # 219932 - tar cistern
  - s. # 219933 - creosoted anchors for guy wire supports on derrick;
  - t. # 219934 - new insulated tank cars;
  - u. # 219935 - pit in locomotive house;
  - v. # 219936 - the new creosoted anchors to guy derrick anchor and deadman are set in concrete;
  - w. # 219937 - new 14 ton Plymouth gasoline locomotive;
  - x. # 219938 - pipe and fittings being salvaged for use in construction.

Response to Request for Admissions Photographs Set 1:

Reilly admits that each of the photographs identified with Bates Stamp Numbers 219915 through 219938 (a) is a fair and accurate depiction of parts of the Reilly facility in 1929; (b) is admissible in evidence; and (c) fairly depicts what it purports to depict. Reilly admits that what is depicted in the photographs was present in 1929. However, after reasonable inquiry and review of information known or readily obtainable, Reilly is unable to admit or deny that the photographs are a fair and accurate depiction of activities at the Reilly site in the year 1929, other than at the time of the taking of the photograph.

Reilly denies that the photographs identified with Bates Stamp Number 219934 depicts "new insulated tank cars"; only one tank car is depicted in the photograph. Reilly denies that the photograph identifies with Bates Stamp Number 219938 depicts "pipes and fittings being salvaged for use in construction"; the pipes are being salvaged for "reconstruction".

## REQUEST FOR ADMISSIONS

### PHOTOGRAPHS SET 2:

2. That each of the photographs identified with Bates Stamp Numbers 219939 through 219962 (a) is a fair and accurate depiction of activities at the Reilly site or of parts of the Reilly facility in 1929; (b) is admissible in evidence; and, (c) fairly depicts:
  - a. # 219939 - location of adzing and boring mill west of treating tanks;
  - b. # 219940 - adzing and boring mill and refuse disposal system;
  - c. # 219941 - adzing and boring mill — refuse dispersal system in basement of mill;
  - d. # 219942 - adzing and boring mill building;
  - e. # 219943 - refuse system from adzing and boring mill; overhead disposal pipe to boiler room; cyclone over boilers;
  - f. # 219944 - refuse disposal system in basement of mill;
  - g. # 219945 - construction of an old loading dock;  
- piling driver for building wall, removal of old pier foundation;
  - h. # 219946 - old loading dock being dismantled;
  - i. # 219947 - creosoted piling under foundation of loading dock retaining wall;
  - j. # 219948 - old loading dock
  - k. # 219949 - view from the east end of new dock location;
  - l. # 219950 - location of west end of dock; cylinder and power house at left; construction shanty in foreground;
  - m. # 219951 - detail of construction of retaining wall for loading dock;
  - n. # 219952 - construction of cross members of loading dock;
  - o. # 219953 - reinforcement and footing of loading dock retaining wall;
  - p. # 219954 - part of concrete dock completed except for fill and tracks;
  - q. # 219955 - view from east end of loading dock;
  - r. # 219956 - finished concrete dock and foundations for mast and derrick;
  - s. # 219957 - construction of retaining wall for loading dock;
  - t. # 219958 - retaining wall expansion; joint in center of photograph;
  - u. # 219959 - loading dock after installation of narrow gauge track;
  - v. # 219960 - detail of wall construction;
  - w. # 219961 - end view of wall detail.
  - x. # 219962 - front end of cylinder building showing structural steel being placed.

Response to Request for Admissions Photographs Set 2:

Reilly admits that each of the photographs identified with Bates Stamp Numbers 219939 and 219945 through 219962 (a) is a fair and accurate depiction of parts of the Reilly facility in 1929; (b) is admissible in evidence; and (c) fairly depicts what it purports to depict. Reilly admits that what is depicted in the photographs was present in 1929. However, after reasonable inquiry and review of information known or readily obtainable, Reilly is unable to admit or deny that the photographs are a fair and accurate depiction of activities at the Reilly site in the year 1929, other than at the time of the taking of the photograph.

Reilly denies that each of the photographs identified with Bates Stamp Numbers 219940 through 219944 is a fair and accurate depiction of parts of the Reilly facility in 1929; these photographs depict parts of the plant in 1930. Reilly admits that each of the photographs identified with Bates Stamp Numbers 219940 through 219944 (a) is a fair and accurate depiction of parts of the Reilly facility in 1929; (b) is admissible in evidence; and (c) fairly depicts what it purports to depict.

Reilly denies that the photograph identified with Bates Stamp Number 219958 depicts "retaining wall expansion; joint in center of photograph"; the photograph depicts a "retaining wall" with an "expansion joint in center of center of photograph".

**REQUEST FOR ADMISSIONS**

**PHOTOGRAPHS SET 3:**

3. That each of the photographs identified with Bates Stamp Numbers 219963 through 219968 (a) is a fair and accurate depiction of activities at the Reilly site or of parts of the Reilly facility in 1929; (b) is admissible in evidence; and, (c) fairly depicts:
- a. # 219963 - new loading dock with cylinder building in foreground; new derrick house in center;
  - b. # 219964 - loading dock with car puller shelter;
  - c. # 219965 - drainage ditch running through the yard;
  - d. # 219966 - cylinder building and loading dock; power house in background;
  - e. # 219967 - loading dock; cylinders at far end;
  - f. # 219968 - reinforcement for trench wall;

**Response to Request for Admissions Photographs Set 3:**

Reilly admits that each of the photographs identified with Bates Stamp Numbers 219963 through 219968 (a) is a fair and accurate depiction of parts of the Reilly facility in 1929; (b) is admissible in evidence; and (c) fairly depicts what it purports to depict. Reilly admits that what is depicted in the photographs was present in 1929. However, after reasonable inquiry and review of information known or readily obtainable, Reilly is unable to admit or deny that the photographs are a fair and accurate depiction of activities at the Reilly site in the year 1929, other than at the time of the taking of the photograph.

Reilly denies that the photograph identified with Bates Stamp Number 219965 depicts the "drainage ditch running through the yard"; the area depicted is the "tie" yard.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 4:

4. That each of the photographs identified with Bates Stamp Numbers 219969 through 219986 (a) is a fair and accurate depiction of activities at the Reilly site or parts of the Reilly facility in 1929, including the storage of ties on the Reilly site, the Reilly plant, and, Reilly equipment; (b) is admissible in evidence; and, that Reilly has produced duplicates of these photographs as follows:

- a. # 219969 - no duplicate
- b. # 219970 - # 219898
- c. # 219971 - # 219870
- d. # 219972 - # 219897
- e. # 219973 - # 219896
- f. # 219974 - # 219871
- g. # 219975 - # 219872
- h. # 219976 - # 219874
- i. # 219977 - # 219876
- j. # 219978 - # 219873
- k. # 219979 - # 219875
- l. # 219980 - # 219877
- m. # 219981 - # 219878
- n. # 219982 - # 219880
- o. # 219983 - # 219882
- p. # 219984 - # 219879
- q. # 219985 - # 219881
- r. # 219986 - # 219883

Response to Requests for Admissions Photographs Set 4:

Reilly admits that each of the photographs identified with Bates Stamp Numbers 219969 through 219986 (a) is a fair and accurate depiction of parts of the Reilly facility, including tie storage on the Reilly site, parts of the Reilly plant, and certain items of Reilly equipment; (b) is admissible in evidence; and, that Reilly has produced duplicates of these photographs as indicated in the Request for Admission.

Reilly denies that each of the photographs identified with Bates Stamp Numbers 219969 through 219986 and its duplicate as identified in Request for Admission is a fair and accurate depiction of parts of the Reilly facility in 1929; the photographs depict parts of the Reilly site in or subsequent to 1953 at the time of the taking of the photograph.



REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 5:

5. That each of the photographs identified with Bates Stamp Numbers 219987 through 219998 (a) is a fair and accurate depiction of the storage of ties at the Reilly site, Reilly equipment and the appearance of portions of the Reilly site in 1929; (b) is admissible in evidence and that Reilly has produced duplicates of these photographs as follows:

- a. # 219987 - # 219884
- b. # 219988 - # 219886
- c. # 219989 - # 219888
- d. # 219990 - # 219885
- e. # 219991 - # 219887
- f. # 219992 - # 219889
- g. # 219993 - # 219890
- h. # 219994 - # 219892
- i. # 219995 - # 219894
- j. # 219996 - # 219891
- k. # 219997 - # 219893
- l. # 219998 - # 219895

Response to Requests for Admissions Photographs Set 5:

Reilly admits that each of the photographs identified with Bates Stamp Numbers 219987 through 219998 (a) is a fair and accurate depiction of parts of the Reilly facility, including tie storage on the Reilly site, parts of the Reilly plant, and certain items of Reilly equipment; (b) is admissible in evidence; and, that Reilly has produced duplicates of these photographs as indicated in the Request for Admission.

Reilly denies that each of the photographs identified with Bates Stamp Numbers 219987 through 219998 and its duplicate as identified in this request for admission is a fair and accurate depiction of parts of the Reilly facility in 1929; the photographs depict parts of the Reilly site in or subsequent to 1953 at the time of the taking of the photograph.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 6:

6. That the photograph identified with Bates Stamp Number 212245 (a) is a fair and accurate depiction of the old RCX tank cars installed in the spring of 1937 for use in loading road tar to spreader trucks and (b) is admissible in evidence.

Response to Request for Admissions Photographs Set 6:

Reilly admits that the photograph identified with Bates Stamp Number 212245 (a) is a fair and accurate depiction of the old RCX tank cars installed in the spring of 1937 for use in loading road tar to spreader trucks and (b) is admissible in evidence.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 7:

7. That each of the photographs identified with Bates Stamp Numbers 401948 through 401958 (a) is a fair and accurate depiction of activities at the Reilly site or of parts of the Reilly facility; (b) is admissible in evidence; and, (c) fairly depicts:
- a. # 401948, # 401949 and # 401950 — duplicate copies of an aerial view of the site in its earliest operations;
  - b. # 401951 — this is the same as # 401957 and # 401958, except that to produce # 401951, the negative was reversed (photograph is backwards);
  - c. # 401952 — ground view of the site, estimated date, early 1950's;
  - d. # 401954, # 401955 and # 401956 are duplicate copies of an aerial view of the site in its earliest operations;
  - e. # 401957 and # 401958 — ground view looking north from southern end of the site, estimated date, early 1950's.

Response to Request for Admissions Photographs Set 7:

Reilly admits that each of the photographs identified with Bates Stamp Numbers 401948, 401949, 401950, 401952, 401954, 401955, 401956, 401957 and 401958 (a) is a fair and accurate depiction of the Reilly site or of parts of the Reilly facility; (b) is admissible in evidence; and, (c) fairly depicts what it purports to depict. Reilly denies that 401951 (a) is a fair and accurate depiction of the Reilly site; (b) is admissible in evidence; and, (c) fairly depicts what it purports to depict.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 8:

8. That each of the photographs identified with Bates Stamp Numbers 219860 through 219869 (a) is a fair and accurate depiction of activities at the Reilly site or parts of the Reilly facility; (b) is admissible in evidence; and, (c) fairly depicts:
- a. # 219860 shows the area occupied by the by-products building after that building was removed during October, 1964; # 219861 is a duplicate of # 219860;
  - b. # 219862 shows a view of the refinery building after the chimneys were torn down in November, 1964; # 219863 is a duplicate of # 219862;
  - c. # 219864 shows the brick chimneys being removed from the refinery in late October-early November, 1964; # 219868 is a duplicate of # 219864;
  - d. # 219865 shows the brick chimneys being removed from the refinery in late October-early November, 1964; # 219867 is a duplicate of # 219865;
  - e. # 219866 shows the brick chimneys being removed from the refinery in late October-early November, 1964; # 219869 is a duplicate of # 219868.

Response to Requests for Admission Photographs Set 8:

Reilly admits that each of the photographs identified with Bates Stamp Numbers 219860 through 219869 (a) is a fair and accurate depiction of activities at the Reilly site or parts of the Reilly facility; (b) is admissible in evidence; and, (c) fairly depicts what it purports to depict.

**REQUEST FOR ADMISSIONS**

**PHOTOGRAPHS SET 9:**

9. That the photograph identified with Bates Stamp Number 220402 (a) is a fair and accurate depiction of a portion of the Reilly plant in April, 1931 and shows a view of the end of the wood treatment cylinders and the sump for creosote drippings and (b) is admissible in evidence.

Response to Request for Admission Photographs Set 9:

Reilly admits that the photograph identified with Bates Stamp Number 220402 (a) is a fair and accurate depiction of a portion of the Reilly plant in April, 1931 and shows a view of the end of the wood treatment cylinders and the sump for creosote drippings and (b) is admissible in evidence.

**REQUEST FOR ADMISSIONS**

**PHOTOGRAPHS SET 10:**

10. That the photograph identified with Bates Stamp Number 220404 (a) is a fair and accurate depiction of a portion of the Reilly plant in February, 1931 and shows a view of the end of a pneumatic pressure pump used in the wood treatment process and (b) is admissible in evidence.

Response to Request for Admissions Photographs Set 10:

Reilly admits that the photograph identified with Bates Stamp Number 220404 (a) is a fair and accurate depiction of a portion of the Reilly plant in February, 1931 and shows a view of the end of a pneumatic pressure pump used in the wood treatment process and (b) is admissible in evidence.

**REQUEST FOR ADMISSIONS**

**PHOTOGRAPHS SET 11:**

11. That the photograph identified with Bates Stamp Number 220406 (a) is a fair and accurate depiction of a portion of the Reilly plant in February, 1931 and shows a view of the sides of the cylinders and associated piping and (b) is admissible in evidence.

**Response to Request for Admission Photographs Set 11:**

Reilly admits that the photograph identified with Bates Stamp Number 220406 (a) is a fair and accurate depiction of a portion of the Reilly plant in February, 1931 and shows a view of the sides of the cylinders and associated piping and (b) is admissible in evidence.

**REQUEST FOR ADMISSIONS**

**PHOTOGRAPHS SET 12:**

12. That the photograph identified with Bates Stamp Number 401960 (a) is a duplicate of the photograph identified with Bates Stamp Number 401961 and of Figure A3-2 in the report prepared for Reilly by ERT, "Recommended Plan for a Comprehensive Solution of Polynuclear Aromatic Hydrocarbon Contamination Problem in the St. Louis Park Area;" (b) is a fair and accurate aerial view of the Reilly site in the 1930's; and (c) is admissible in evidence.

**Response to Request for Admission Photographs Set 12:**

Reilly admits that the photograph identified with Bates Stamp Number 401960 (a) is a duplicate of the photograph identified with Bates Stamp Number 401961 and of Figure A3-2 in the report prepared for Reilly by ERT, "Recommended Plan for a Comprehensive Solution of Polynuclear Aromatic Hydrocarbon Contamination Problem in the St. Louis Park Area;" (b) is a fair and accurate aerial view of the Reilly site in the 1930's; and (c) is admissible in evidence.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 13:

13. That each of the photographs identified with Numbers 402001R through 402012R (a) is a fair and accurate depiction of the Reilly site as it appeared during or after heavy precipitation in April, 1965 and (b) is admissible in evidence.

Response to Requests for Admission Photographs Set 13:

Reilly admits that each of the photographs identified with Numbers 402001R through 402012R (a) is a fair and accurate depiction of the Reilly site as it appeared during or after heavy precipitation in April, 1965 and (b) is admissible in evidence.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 14:

13. That each of the photographs identified with Bates Stamp Numbers 221588 through 221596 (a) is a fair and accurate depiction of the Reilly site as it appeared in the late 1960s or early 1970s; (b) is admissible in evidence; and, (c) fairly depicts:
- a. # 221588 - two panoramas of a northerly view over the south end of the property showing recently creosoted ties;
  - b. # 221589 - two panoramas; one is an easterly view of the property from the park land adjacent to the west property line; the other is a westerly view from 2nd Stree NW of the property;
  - c. # 221590 - two pictures; one is an easterly view over the south end of the property; the other is of the pole building;
  - d. # 221591 - three pictures; one shows ties stored in the yard area; the second shows structural damages in the washroom/lunchroom; the third shows a view of the north yard area.
  - e. # 221592 - three pictures; the first is a panorama of a westerly view over the yard area; the second is a westerly view of the boiler and pump building; and the third is a photograph of the lunch and locker room building.
  - f. # 221593 - three pictures; the first is a southerly view of the yard; the second shows yard inventory ties; and the third shows Block 306 along the west edge of the property.
  - g. # 221594 - three pictures; the first shows ties stored in the yard; the second is a southeasterly view of storage tanks; and, the third is a northwesterly view;
  - h. # 221595 - three pictures; the first is of the treating retort building; the second is of the burned out adzing and boring building; and the third is a westerly view of the office building;
  - i. # 221596 - three pictures; the first is a westerly view of the refinery building and storage tanks; the second is an easterly view of the refinery building; and the third is a southeasterly view of the blacksmith shop and garage.



Response to Request for Admission Photographs Set 14:

Reilly admits that each of the photographs identified with Bates Stamp Numbers 221588 through 221596 (a) is a fair and accurate depiction of the Reilly site as it appeared in the late 1960's or early 1970's; (b) is admissible in evidence; and, (c) fairly depicts what they purport to depict.

**REQUEST FOR ADMISSIONS**

**PHOTOGRAPHS SET 15:**

15. That the photographs identified with Bates Stamp Numbers 220720 and 220721 (a) are fair and accurate depictions of views of the refinery in May, 1930; (b) are admissible in evidence; and, (c) fairly depict:
  - a. # 220720 is two pictures, the first of the refinery building; showing the Pan Room in the foreground; the second is a general view of the plant showing tie storage;
  - b. # 220721 is two pictures, the first showing the treating plant and loading dock and the second showing a view toward the office with storage tanks on the left and the refinery on the right.

**Response to Request for Admission Photographs Set 15:**

Reilly admits that the photographs identified with Bates Stamp Numbers 220720 and 220721 (a) are fair and accurate depictions of views of the refinery and other facilities on the Reilly site in May, 1930; (b) are admissible in evidence; and, (c) fairly depict what they purport to depict.

**REQUEST FOR ADMISSIONS**

**PHOTOGRAPHS SET 16:**

16. That the photographs identified as RTC Exhibit 470; RTC Exhibit 471; and RTC. Exhibit 472 (a) are fair and accurate depictions of the refinery site in the 1930s; (b) are admissible in evidence; and, that RTC Exhibit 471 is a blow-up of a portion of RTC Exhibit 470.

**Response to Request for Admission Photographs Set 16:**

Reilly admits that the photographs identified as RTC Exhibit 470; RTC Exhibit 471; and RTC Exhibit 472 (a) are fair and accurate depictions of the refinery site in the 1930s; (b) are admissible in evidence; and, that RTC Exhibit 471 is a blow-up of a portion of RTC Exhibit 470.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 17:

17. That the photograph identified as MN. Exhibit 153 (a) is a fair and accurate depiction of the Reilly Tar site in the 1930s, taken looking into the entrance of the plant and (b) is admissible in evidence.

Response to Request for Admission Photographs Set 17:

Reilly admits that the photograph identified as MN. Exhibit 153 (a) is a fair and accurate depiction of the Reilly Tar site in the 1930s, taken looking into the entrance of the plant and (b) is admissible in evidence.

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REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 18:

18. That the photographs identified by Bates Stamp Numbers 401884 through 401886 (a) are fair and accurate depictions of the Reilly site in the 1960s and (b) are admissible in evidence.

Response to Request for Admission Photographs Set 18:

Reilly admits that the photographs identified by Bates Stamp Numbers 401884 through 401886 (a) are fair and accurate depictions of the Reilly site in the 1960s and (b) are admissible in evidence.

REQUEST FOR ADMISSIONS

PHOTOGRAPHS SET 19:

18. That the photographs identified as RTC Exhibit 150
- (a) consist of fourteen photographs which are fair and accurate depictions of the the Reilly plant in 1929;
  - (b) are admissible in evidence; and, (c) include views of:
- a. cylinder # 2 placed on a new foundation;
  - b. retaining wall in the foreground, railroad car on left;
  - c. finished concrete dock showing the beams-derrick and mast foundations;
  - d. new foundation for car puller;
  - e. new derrick and mast foundations;
  - f. location of one of the trenches;
  - g. reinforcement and footing used in construction of loading dock retaining wall;
  - h. creosoting plant in background; picture take from east end of loading dock;
  - i. detail of construction of retaining wall for the loading dock;
  - j. part of concrete dock completed except for the fill and tracks;
  - l. reinforcement used in new derrick foundation;
  - m. construction of cross members of loading dock;
  - n. location of new adzing and boring mill just west of treating tanks;
  - o. new piers for #8 and #3 cylinders.

Response to Request for Admission Photographs Set 19:

Reilly admits that the photographs identified as RTC Exhibit 150 (a) consist of fourteen photographs which are fair and accurate depictions of the Reilly plant in 1929; (b) are admissible in evidence; and, (c) include views of:

- a. cylinder #2 placed on a new foundation;
- b. retaining wall in the foreground, railroad car on left;
- c. finished concrete dock showing the beams-derrick and mast foundations;
- d. new foundation for car puller;
- e. new derrick and mast foundations;
- f. location of one of the trenches;
- g. reinforcement and footing used in construction of loading dock retaining wall;
- h. creosoting plant in background; picture taken from east end of loading dock;
- i. detail of construction of retaining wall for the loading dock;
- j. part of concrete dock completed except for the fill and tracks;
- k. reinforcement used in new derrick foundation;
- l. construction of cross members of loading dock;
- m. location of new adzing and boring mill just west of treating tanks;
- n. new piers for #8 and #3 cylinders.

Dated: March 11, 1985

REILLY TAR & CHEMICAL  
CORPORATION

By Robert Polack  
Robert Polack

Subscribed and sworn to before me  
this 11th day of March, 1985.

Veronica M. Bledsoe  
Notary Public

VERONICA M. BLEDSOE  
MY COMMISSION EXPIRES JANUARY 29, 1986

DORSEY & WHITNEY

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